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**Federal Express Delivery**

November 20, 2003

Sharla Dillon  
Dockets and Records Office  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

**Re: Docket Nos. 03-00491; 03-00526; 03-00527 Triennial Review Order Proceeding**

Dear Ms. Dillon:

Attached are originals of Z-Tel's Communication Inc.'s Objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Set of Interrogatories (Docket Nos. 03-00491 & 03-00526), Response to BellSouth's First Set of Interrogatories (Docket Nos. 03-00491 & 03-00526), Objections to BellSouth's First Request for Production of Documents (Docket Nos. 03-00491 & 03-00526), Response to BellSouth's First Request for Production of Documents (Docket Nos. 03-00491 & 03-00526), Objections to BellSouth's First Set of Interrogatories (Docket No. 03-00527), and Response to BellSouth's First Set of Interrogatories (Docket No. 03-00527).

Thank you for your attention to this matter.

Sincerely,

Michael Strobl  
Director, Strategic Planning  
Z-Tel Communications, Inc.

cc: Guy M. Hicks; R. Douglas Lackey

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

In re: Implementation of the Federal  
Communications Commission's Triennial  
Review Order (Nine-month Proceeding)  
(Loop & Transport)

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Docket Nos. 03-00527

Filed: November 20, 2003

**OBJECTIONS OF Z-TEL COMMUNICATIONS, INC. TO  
BELLSOUTH'S FIRST SET OF INTERROGATORIES**

Z-Tel Communications, Inc. ("Z-Tel") submits its preliminary objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Set of Interrogatories to Z-Tel.

These objections are preliminary in nature. Should additional grounds for objection be discovered as Z-Tel prepares its responses to any discovery, Z-Tel reserves the right to supplement these objections.

Further, at the time of the filing of these objections, the issues to be addressed in this proceeding have not yet been identified. Should additional grounds for objections develop as the Regulatory Authority identifies the issues to be addressed in this proceeding, Z-Tel reserves the right to supplement these objections.

**PRELIMINARY GENERAL OBJECTIONS**

Z-Tel makes the following general objections to the First Set of Interrogatories:

1. Z-Tel objects to the "Definitions" section and the individual items of BellSouth's First Set of Interrogatories to Z-Tel to the extent that they are overly broad, unduly burdensome, and/or oppressive.

2. Z-Tel objects to the "Definitions" section and the individual interrogatories to the extent they seek information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. By way of illustration and not limitation, Z-Tel objects to

interrogatories that seek information that is unrelated to or inconsistent with the methodology and parameters of the analysis of impairment prescribed by the FCC in its Triennial Review Order.

3. Z-Tel objects to the "Definitions" section and the individual interrogatories to the extent they are vague, ambiguous, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these Requests.

4. Z-Tel objects to the "Definitions" section and the individual items of BellSouth's First Set of Interrogatories to Z-Tel to the extent that they purport to impose discovery obligations on Z-Tel that exceed the scope of discovery allowed by the applicable Tennessee Rules of Civil Procedure.

5. Z-Tel objects to BellSouth's First Set of Interrogatories to Z-Tel to the extent that the interrogatories seek discovery of materials and/or information protected by the attorney/client privilege, the work product doctrine, the accountant/client privilege, or any other applicable privilege.


6. Z-Tel objects to BellSouth's First Set of Interrogatories to the extent that the requests would require disclosure of information that constitutes trade secrets and/or confidential, proprietary business information, which either should not be disclosed at all or should be disclosed (provided the information is otherwise discoverable) only pursuant to the terms of a mutually acceptable confidentiality agreement and use of the Regulatory Authority's rules and procedures relating to confidential and proprietary information.

7. Z-Tel objects to all interrogatories which would require Z-Tel to provide information which is already in BellSouth's possession or is in the public record before the Regulatory Authority. To duplicate information that BellSouth already has or is readily available

to BellSouth would be unduly burdensome and oppressive.

8. Z-Tel objects to BellSouth's First Set of Interrogatories to the extent BellSouth seeks to impose an obligation on Z-Tel to respond on behalf of subsidiaries and/or former officers, employees, agents, and directors on the grounds that such requests for production are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

9. Z-Tel will interpret each interrogatory as relating to intrastate Tennessee operations within BellSouth's service area. To the extent any interrogatories are not intended to relate to Tennessee intrastate operations within BellSouth's Tennessee service area, Z-Tel objects to such interrogatories as overbroad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.



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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Z-TEL Communications, Inc.'s Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories has been provided by Federal Express Delivery this 20th day of November 2003, to the following:

Sharla Dillon  
Dockets and Records Office  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Guy M. Hicks  
BellSouth Telecommunications, Inc.  
333 Commerce Street, Suite 2101  
Nashville, TN 37291-3300

R. Douglas Lackey  
BellSouth Telecommunications, Inc.  
Suite 4300  
675 W. Peachtree Street, NE  
Atlanta, GA 30375

A handwritten signature in black ink, appearing to read "Michael S. Strobl", written over a horizontal line.

Michael S. Strobl